

**IN THE UNITED STATES DISTRICT COURT FOR THE
EASTERN DISTRICT OF VIRGINIA
Alexandria Division**

SZY HOLDINGS, LLC,

and

FARFROMBORINGPROMITIONS.COM,
LLC,

Plaintiffs,

v.

IPF SOURCING LLC,

RICO GARCIA,

and

HAMSA HOLDINGS, LLC

Defendants.

Civil Case No. 1:20-cv-01475-LO-JFA

**MOTION OF ALEXANDER P. FAIG TO WITHDRAW AS COUNSEL OF
DEFENDANT RICO GARCIA AND DEFENDANT HAMSA HOLDINGS, LLC**

Pursuant to Local Rule 83.1(G), Alexander P. Faig respectfully moves this Court for leave to withdraw as Attorney of Record for Defendant Rico Garcia and Defendant Hamsa Holdings, LLC (collectively “Defendants Garcia and HH”). Movant certifies that reasonable notice has been given to Defendant Rico Garcia and Defendant Hamsa Holdings, LLC.

1. On April 14, 2022, Defendants Garcia and HH retained Movant and Movant filed his Notice of Appearance as counsel for Defendants Garcia and HH.

2. On April 15, 2022, Movant appeared at a default judgment hearing in this case on Defendants Garcia and HH’s behalf. At the hearing, the Court continued the hearing on Plaintiff’s Motion for Default Judgment and permitted Defendants Garcia and HH to file a

Motion to Set Aside Entry of Default by April 29, 2022.

3. On April 21, 2022, Movant was discharged by Defendants Garcia and HH.

4. Local Rule 83.1(G) provides that an attorney shall not withdraw an appearance in any civil action “except on order of the Court and after reasonable notice to the party on whose behalf said attorney has appeared.” Local Rule 83.1(I) provides that the Virginia Rules of Professional Conduct governs “the ethical standards relating to the practice of law in civil cases[.]”

5. Rule 1.16(a)(3) of the Virginia Rules of Professional Conduct provides that “where representation has commenced, [a lawyer] shall withdraw from the representation of a client if . . . the lawyer is discharged.”

6. As noted above, Movant was discharged by Defendants Garcia and HH—this Motion is with their consent and at their direction. The parties on whose behalf Movant has appeared are thus on reasonable notice.

WHEREFORE, Movant respectfully requests that the Court enter an Order permitting him to withdraw as counsel of record for Defendant Rico Garcia and Defendant Hamsa Holdings, LLC. A proposed order is attached hereto as Exhibit A.

Date: April 22, 2022

Respectfully Submitted,

/s/Alexander P. Faig
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CERTIFICATE OF SERVICE

I hereby certify that on the 22nd day of April, 2022, I electronically filed the foregoing with the Clerk of Court using the CM/ECF system, which will then send a notification of such filing (NEF) to the following:

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